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*Counsel for Plaintiff  
FocalPoint International, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

FOCALPOINT INTERNATIONAL, INC.,

Plaintiff,

vs.

DOM RUBINO CONSULTING SERVICES,  
INC.; and BIZSTRATPLAN, INC.,

Defendants.

Case No.: 2:18-cv-00236-APG-PAL

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR DEFENDANTS  
TO FILE A RESPONSE TO PLAINTIFF  
FOCALPOINT INTERNATIONAL, INC.'S  
MOTION TO ENFORCE AGREED UPON  
NEVADA FORUM SELECTION CLAUSE  
AND ENJOIN IMPROPER LAWSUIT IN  
CANADA**

**[FIRST REQUEST]**

Plaintiff, FocalPoint International, Inc. ("FocalPoint"), by and through its undersigned counsel of record, and Defendants, Dom Rubino Consulting Services, Inc. and BizStratPlan, Inc. ("Defendants") (collectively, the "Parties"), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. On March 27, 2018, FocalPoint filed a Motion to Enforce Agreed Upon Nevada Forum Selection Clause and Enjoin Improper Lawsuit in Canada ("Motion to Enforce") [ECF No. 13].

2. Defendants' deadline to file a response to FocalPoint's Motion to Enforce is April 10, 2018.

3. Due to scheduling conflicts of counsel, FocalPoint and Defendants have stipulated to allow Defendants additional time to file their response to FocalPoint's Motion to Enforce. This is the first request for an extension of time of Defendants' April 10, 2018 deadline.

The Parties accordingly request an extension for Defendants to file their response to FocalPoint's Motion to Enforce up to and including **April 17, 2018**.

**IT IS SO STIPULATED.**

DATED this 3rd day of April, 2018.

DATED this 3rd day of April, 2018.

GREENBERG TRAURIG, LLP

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Jacob D. Bundick, Esq.

/s/ Dan R. Waite, Esq.

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*Counsel for Plaintiff*

*FocalPoint International, Inc.*

*Counsel for Defendants Dom Rubino Consulting  
Services, Inc. and BizStratPlan, Inc.*

**IT IS SO ORDERED** this 11th day of April, 2018.



UNITED STATES DISTRICT JUDGE /

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of April, 2018, a true and correct copy of the foregoing  
**STIPULATION AND ORDER FOR EXTENSION OF TIME FOR DEFENDANTS TO FILE  
A RESPONSE TO PLAINTIFF FOCALPOINT INTERNATIONAL, INC.'S MOTION TO  
ENFORCE AGREED UPON NEVADA FORUM SELECTION CLAUSE AND ENJOIN  
IMPROPER LAWSUIT IN CANADA [FIRST REQUEST]** was filed electronically via the  
Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's  
CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Shayna Noyce

An employee of Greenberg Traurig, LLP

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